

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AGUDAS CHASIDEI CHABAD OF
UNITED STATES,

Plaintiff,

v.

RUSSIAN FEDERATION; RUSSIAN
MINISTRY OF CULTURE AND MASS
COMMUNICATION; RUSSIAN STATE
LIBRARY; and RUSSIAN STATE MILITARY
ARCHIVE,

Defendants.

Misc. Case No. 19-mc-271

Underlying Case in the U.S. District
Court for the District of Columbia, Civil
Action No. 1:05-cv-01548-RCL

**NOTICE OF MOTION TO QUASH
THE SUBPOENA DATED
MARCH 26, 2019**

PLEASE TAKE NOTICE that, pursuant to Rule 45 of the Federal Rules of Civil Procedure, upon the accompanying Memorandum of Law in Support of Non-Party State Development Bank VEB.RF (“VEB”) (f/k/a Vnesheconombank)’s Motion to Quash the Subpoena dated March 26, 2019, the exhibits thereto, and the Declaration of Kenneth J. Pfaehler, Non-Party VEB will move this Court, the United States District Court for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007-1312, at a date and time to be determined by the Court, for an Order quashing the subpoena dated March 26, 2019, or in the alternative for an order staying compliance with the Subpoena pending resolution of the issues identified in the United States’ Statements of Interest, with leave to refile the motion to quash at that time.

Dated: May 24, 2019

Respectfully submitted,

DENTONS US LLP

/s/ Kenneth J. Pfaehler

Kenneth J. Pfaehler

Dentons US LLP

1900 K Street, N.W.

Washington, D.C. 20006

(202) 408-6468

(202) 496-7756

kenneth.pfaehler@dentons.com

*Counsel for Non-Party State Development
Bank VEB.RF (f/k/a Vnesheconombank)*